

# **Canterbury**

District Health Board

Te Poari Hauora o Waitaha

## **Submission on Parks and Reserves Bylaw**

**To:** Selwyn District Council

**Submitter:** Canterbury District Health Board

Attn: Kirsty Peel  
Community and Public Health  
C/- Canterbury District Health Board  
PO Box 1475  
Christchurch 8140

## SUBMISSION ON PARKS AND RESERVES BYLAW

### Details of submitter

1. Canterbury District Health Board (CDHB).
2. The submitter is responsible for promoting the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956. These statutory obligations are the responsibility of the Ministry of Health and, in the Canterbury District, are carried out under contract by Community and Public Health under Crown funding agreements on behalf of the Canterbury District Health Board.
3. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.
4. We welcome the opportunity to comment on the Parks' and Reserves Bylaw. The future health of our populations is not just reliant on hospitals, but on a responsive environment where all sectors work collaboratively.
5. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector. These influences can be described as the conditions in which people are born, grow, live, work and age, and are impacted by environmental, social and behavioural factors. They are often referred to as the 'social determinants of health'<sup>1</sup>.
6. The most effective way to maximise people's wellbeing is to take these factors into account as early as possible during decision making and strategy development. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact<sup>2</sup>.

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<sup>1</sup> Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

<sup>2</sup> McGinnis JM, Williams-Russo P, Knickman JR. 2002. *The case for more active policy attention to health promotion*. *Health Affairs*, 21(2): 78 - 93.

## **General Comments**

7. The CDHB supports the overall vision of the Parks and Reserves Bylaw and has some suggestions for consideration which would further improve health outcomes for the community.

### ***Section 6 - Behaviour in Parks and Reserves***

8. The CDHB recommends that section 6.1a) be amended as follows to ensure no harmful pollutants enter waterways.

**Pollute**, damage, bury disturb or remove any item in a reserve, **particularly where such pollutants could enter waterways.**

9. The CDHB supports section 6.1 i) prohibiting the lighting of fireworks as this will reduce the risk of fire and fireworks related injuries.
10. The CDHB supports section 6.1 l) prohibiting the leaving of any litter and encourages the Council to ensure that there are sufficient rubbish disposal mechanisms in place to prevent fly-tipping.
11. The CDHB recommends that an alcohol ban be put in place at sports fields to control sideline drinking behaviour. The only drinking on sports fields should be within licensed zones. Evidence suggests that drinking is normalised within the cultures of many sports, particularly both rugby codes, and that high risk drinking is frequently associated with sports participation<sup>[1]</sup>. Interventions to curb sideline drinking and associated antisocial behaviour have so far been attempted via individual clubs, however such programmes could be more effective if supported by local government via alcohol bans at sports fields.

### ***Section 7 - Conduct in Facilities***

12. The CDHB supports section 7.1 a), the prohibition of polluting, damaging, and interfering with the facility, particularly as it relates to swimming pools where intentional damage may affect the ability to provide a safe facility.

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<sup>[1]</sup> Cockburn, R. & Atkinson, L. 2017. Respect and Responsibility Review: New Zealand Rugby.  
[http://files.allblacks.com/NZRU\\_Media\\_Releases/2017/NZR\\_RRR\\_Final\\_Review\\_Report\\_070917.pdf](http://files.allblacks.com/NZRU_Media_Releases/2017/NZR_RRR_Final_Review_Report_070917.pdf)

13. The CDHB recommends that for the sake of consistency with the Sale and Supply of Alcohol Act 2012 that section 7.1d) refers to 'alcohol' instead of 'intoxicating liquor'. The CDHB also recommends that wording be added to the end of section 7.1 d) to refer to the requirement for alcohol consumption to occur only where a licence has been provided. We suggest the following wording:

Consume any **alcohol**, except where that consumption occurs:

i) in areas set aside for the purpose, or

ii) at an authorised function;

**and where a valid alcohol licence is in force, or**

### ***Section 8 - Vehicle Controls within Reserves***

14. The CDHB supports section 8.6 prohibiting the operation of a vehicle in a natural water body as this will help reduce the potential for contamination of waterways.

### ***Section 10 – Fires***

15. The CDHB supports the prohibition of lighting of fires, with the proposed exceptions.

### ***Section 11 – Camping***

16. The CDHB seeks clarification as to the relationship between section 11 and the Freedom Camping Act. The CDHB is interested to ensure that facilities where camping is allowed are fit for purpose to minimise public health risk from environmental contamination (e.g. adequate disposal of human waste and access to potable water).

## **Conclusion**

1. The CDHB does not wish to be heard in support of this submission.
2. Thank you for the opportunity to submit on Parks and Reserves Bylaw.

**Person making the submission**

A handwritten signature in purple ink, appearing to be 'R. Pink', with a large loop above the 'P' and a horizontal line underneath.

Dr Ramon Pink  
Public Health Physician,  
Canterbury District Health Board

19<sup>th</sup> November, 2018

**Contact details**

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